

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

RONNIE GILES,

PLAINTIFF,

V.

**CIVIL ACTION NO: 3:06-cv-
00528-WKW-VPM**

MASTERBRAND CABINETS, INC., UNOPPOSED

DEFENDANT.

MOTION TO EXTEND DISCOVERY

COMES NOW the Plaintiff and moves this Court for an Order extending the discovery deadline in this matter:

1. Plaintiff is seeking to take one deposition of a 30(b)(6) deponent prior to trial on the topics of Defendant's vacation and attendance policies.
2. Due to scheduling conflicts, Plaintiff's counsel, Defendant's counsel and the potential deponent, Perry Ezell do not have a mutually agreeable date with the discovery period of July 9, 2007 to conduct the deposition.
3. Plaintiff requests an extension of the discovery deadline until July 31, 2007.
4. Defendant has suggested the deposition take place following the Pre-Trial Conference on July 18, 2007 in order to minimize unnecessary travel time and expense.

5. Plaintiff has consulted with Defendant's counsel and this motion is unopposed.

WHEREFORE PREMISES CONSIDERED, Plaintiff moves this Court for an Order extending the discovery deadline for the express and sole purpose of conducting the above describe deposition. .

Respectfully submitted,

/s/ Allen D. Arnold

Allen D. Arnold

OF COUNSEL:
ARENDALL & ASSOCIATES
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CERTIFICATE OF SERVICE

I have filed the foregoing with the Clerk of the Court using the CM/ECF system on June 29, 2007, which will forward a copy to:

Mark J. Romaniuk
Kelley Bertoux Creveling

/s/ Allen D. Arnold

Of Counsel